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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN JOSE DIVISION**

14 IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

15 THIS DOCUMENT RELATES TO:
16 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF ANNE M. SELIN
IN SUPPORT OF DEFENDANTS'
RENEWED ADMINISTRATIVE
MOTION TO SEAL**

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21 I, Anne M. Selin, declare as follows:


22 1. I am an attorney with the law firm of Mayer Brown LLP, counsel for Defendant
23 Google, Inc. ("Google") in the above-captioned matter. I am admitted to practice law before this
24 Court. I submit this declaration in support of Defendants' Renewed Administrative Motion to
25 Seal that is being filed concurrently herewith. As an attorney involved in the defense of this
26 action, unless otherwise stated, I have personal knowledge of the facts stated in this declaration
27 and if called as a witness, I could and would competently testify to them.

1 2. I have read and reviewed Exhibit 21 to the Declaration of Christina Brown in
2 Support of Defendants' Opposition to Plaintiffs' Motion for Class Certification ("Exhibit 21"),
3 which is a copy of the Declaration of Frank Wagner in Support of Defendants' Opposition to
4 Plaintiffs' Motion for Class Certification and three attached exhibits. I understand that Google
5 previously sought to seal Exhibit 21 in its entirety based on the Declaration of Frank Wagner in
6 Support of Administrative Motion to Seal (*see* Dkt. 221) ("Wagner Declaration"), which
7 explained that Exhibit 21 contained confidential and highly sensitive details about Google's
8 compensation and recruiting practices. Wagner Decl. ¶¶ 4-8. I understand that the Court denied
9 the request to seal this exhibit in its entirety because Google's request was not "sufficiently
10 particularized," but that the Court also found that "Google has established good cause to
11 maintain some of this exhibit under seal." (*See* Dkt. 273 at 19:5-7). Google has identified and
12 made specific and narrowly tailored redactions of particular portions of Exhibit 21 that contain
13 the most confidential and highly sensitive details about Google's compensation and recruiting
14 practices. Google's redactions to Exhibit 21 are attached to Defendants' renewed administrative
15 motion to seal.

16 3. I have also read and reviewed Exhibit 25 to the Declaration of Christina Brown in
17 Support of Defendants' Opposition to Plaintiffs' Motion for Class Certification ("Exhibit 25"),
18 which is presentation entitled "Compensation Overview." I understand that Google previously
19 sought to seal Exhibit 25 in its entirety based on the Wagner Declaration, which explained that
20 Exhibit 25 contained confidential and highly sensitive details about. I understand that the Court
21 denied the request to seal this exhibit in its entirety because Google's request was not
22 "sufficiently particularized," but that the Court also found that "Google has established good
23 cause to maintain some of this exhibit under seal." (*See* Dkt. 273 at 19:17-18). Google has
24 identified and made specific and narrowly tailored redactions of particular portions of Exhibit 25
25 that contain the most confidential and highly sensitive details about Google's compensation and
26 recruiting practices. Google's redactions to Exhibit 25 are attached to Defendants' renewed
27 administrative motion to seal.
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1 4. I have also read and reviewed Defendants' Memorandum of Law in Support of
2 Their Motion to Strike the Report of Dr. Edward E. Leamer ("Defendants' Motion to Strike").
3 Due to last minute formatting changes that changed the pagination in the Defendants' Motion to
4 Strike, the page references in the Wagner Declaration that relate to the Motion to Strike were
5 inaccurate. In particular, in paragraph 9(c) of the Wagner Declaration, the phrase "Pages 20 to
6 21 (including Figure 16)" should have stated "Pages 19:13-17 to 20 (including Figure 16)." I
7 understand the Court has already granted Google's request to seal Figure 16 along with Pages 20
8 to 21. (*See* Dkt. 273 at 20:2). Google, however, only seeks to seal Figure 16 on page 20 and
9 lines 13-17 on page 19, because "this excerpt and figure contain confidential and highly sensitive
10 details about the total compensation for senior software engineers and other engineering job titles
11 at Google during the time period between 2005 and 2009." Wagner Decl. ¶ 9(c).

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct. Executed on January 22, 2013 in Palo Alto, California.

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16 Anne M. Selin